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Attorneys for Relator Craig Thomas

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

United States of America *ex rel.* Craig
Thomas,

Plaintiff/Relator,

v.

Mercy Care, and Touchstone Behavioral
Health d/b/a Touchstone Health Services,

Defendants.

Case No.: 2:22-cv-00512-PHX-JAT

**JOINT STIPULATION OF
DISMISSAL PURSUANT TO
RULE 41(a)(1)**

NOTICE OF JOINT DISMISSAL

Pursuant to Fed. R. Civ. P. 41(a)(1), the United States and Relator, through their undersigned counsel, hereby stipulate to the dismissal of this action, subject to the terms of the August 14, 2025 Settlement Agreement (the "Settlement Agreement"). More specifically, the dismissal is as follows:

1. The dismissal shall be with prejudice as to the United States and Relator for the Covered Conduct, as defined in the Settlement Agreement.

1 2. The dismissal shall be with prejudice to the Relator as to all other claims that were
2 made or could have been made in this action.

3 3. The dismissal shall be without prejudice to the United States any other claims.

4 4. The United States, Relator, and Touchstone Health Services agree that, except as
5 specifically set forth in the Settlement Agreement, each party will bear its own legal
6 and other costs incurred in connection with this matter.

7 5. The United States and the Relator have also reached agreement as to the Relator's share
8 of the settlement proceeds pursuant to 31 U.S.C. § 3730(d)(1), as set forth in the
9 Settlement Agreement.

10 The parties respectfully request that the Court retain jurisdiction over the parties to the
11 extent necessary to enforce the terms and conditions of the Settlement Agreement and respectfully
12 request that the Court enter the attached Order.

13
14 Dated: September 18, 2025

HALUNEN LAW

15 s/ Paul M. Schinner
16 Attorney for Relator Craig Thomas

17 GORDON REES SCULLY MANSUKHANI, LLP

18
19 By: /s/ Jill Ormond
20 Jill Ormond
21 Shawn Alves
22 Attorneys for Defendant Touchstone

23 TIMOTHY COURCHINE
24 United States Attorney
25 District of Arizona

26 s/ Jennifer Levinson
27 JENNIFER LEVINSON
28 Assistant United States Attorney
 Attorney for the United States of America

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2025, I caused a true and complete copy of the foregoing was filed electronically transmitted to the Clerk's Office using the CM/ECF System for filing thereby transmitting a notice of electronic filing to all counsel and parties of record.

By: /s/ Paul M. Schinner